

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KAMILAH BROCK,

Plaintiff,

- against -

**REPLY DECLARATION OF
JOSHUA J. LAX IN
FURTHER SUPPORT OF
DEFENDANTS' MOTION
FOR PARTIAL SUMMARY
JUDGMENT**

15 Civ. 1832 (VSB)

THE CITY OF NEW YORK, NEW YORK CITY
HEALTH AND HOSPITALS CORPORATION, HARLEM
HOSPITAL, DR. ELISABETH LESCOUFLAIR,
Individually and in her official capacity, DR. ZANA
DOBROSHI, Individually and in her official capacity, DR.
ALAN DUDLEY LABOR, Individually and in his official
capacity, DR. HERMAN ANDERSON, Individually and in
his official capacity, and POLICE OFFICER SALVADOR
DIAZ, Shield No. 21953, Individually and in his official
capacity,

Defendants.

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JOSHUA J. LAX, an attorney duly admitted to practice in the Courts of New
York, declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, states that the
following statements are true:

1. I am a Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the
City of New York, attorney for defendants City of New York New York City Health and
Hospitals Corporation, Harlem Hospital, Elisabeth Lescouflair, Zana Dobroshi, Alan
Dudley Labor and Salvador Diaz. As such, I am familiar with the facts and
circumstances stated herein and submit this reply declaration in further support of
defendants' motion for summary judgment pursuant to FED. R. CIV. P. 56.

2. Annexed hereto as Exhibit “P” are excerpts of the Deposition of Salvador Diaz, taken February 26, 2016.
3. Annexed hereto as Exhibit “Q” are excerpts from the Deposition of Herman Anderson, taken June 6, 2016.
4. Annexed hereto as Exhibit “R” are excerpts from the Deposition of Charles Nnadi, taken July 5, 2016.
5. Annexed hereto as Exhibit “S” are excerpts from the Deposition of Zana Dobroshi, taken June 9, 2016.
6. Annexed hereto as Exhibit “T” are excerpts from the Deposition of Plaintiff, Kamilah Brock, taken November 17, 2015.
7. Annexed hereto as Exhibit “U” are excerpts from the Deposition of Dr. Elisabeth Lescouflair, taken March 10, 2016.

Dated: New York, New York
April 17, 2017

ZACHARY W. CARTER
Corporation Counsel of the
City of New York
Attorney for Defendants
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By: /s/
Joshua J. Lax
Assistant Corporation Counsel

TO: BY ECF
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